

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----x  
JENNIFER BABCOCK, an individual;  
on behalf of herself and all  
other similarly situated consumers,

Plaintiff,

ANSWER

-against-

14-CV-3124

C.TECH COLLECTIONS, INC., a New  
York Corporation; JOEL R.  
MARCHIANO, individually and in  
his official capacity; JAMES W.  
ARGENT, individually and in his  
official capacity; CYNTHIA A.  
MICHELS, individually and in her  
official capacity; and JOHN AND  
JANE DOES NUMBERS 1 THROUGH 25,

Defendants.

-----x  
Defendants C.TECH COLLECTIONS, INC., JOEL R. MARCHIANO, JAMES  
W. ARGENT AND CYNTHIA A. MICHELS, by their attorney, Arthur Sanders,  
Esq., answers plaintiff's complaint as follows:

1. Defendants acknowledge being sued pursuant to the Fair  
Debt Collection Practices Act (FDCPA) and State law, but deny any  
violation thereof.

2. Defendants acknowledge being sued pursuant to the Fair  
Debt Collection Practices Act (FDCPA), but deny any violation thereof.

3. The allegations in this paragraph are not directed at the  
defendants and do not require any admission or denial.

4. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

5. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

6. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

7. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

8. Defendants acknowledge being sued pursuant to the Fair Debt Collection Practices Act (FDCPA) and State law, but deny any violation thereof.

9. Defendants admit the allegations contained paragraph "9" of the complaint.

10. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.

11. Defendants admit the allegations contained in paragraph "11" of the complaint

12. Defendants admit the allegations contained in paragraph "12" of the complaint.

13. Defendants admit the allegations contained in paragraph "13" of the complaint.

14. Defendants admit the allegations contained in paragraph "14" of the complaint.

15. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "15" of the complaint.

16. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "16" of the complaint.

17. Defendants admit the allegations contained in paragraph "17" of the complaint.

18. Defendants deny each and every allegation contained in paragraph "18" of the complaint.

19. Defendants deny each and every allegation contained in paragraph "19" of the complaint.

20. Defendants admit the allegations contained in paragraph "20" of the complaint.

21. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "21" of the complaint.

22. Defendants admit the allegations contained in paragraph "22" of the complaint.

23. Defendants admit the allegation contained in paragraph "23" of the complaint.

24. Defendants admit the allegations contained in paragraph "24" of the complaint.

25. Defendants admit the allegations contained in paragraph "25" of the complaint.

26. Defendants admit the allegations contained in paragraph "26" of the complaint.

27. Defendants admit the allegations contained in paragraph "27" of the complaint.

28. Defendants admit the allegations contained in paragraph "28" of the complaint.

29. Defendants deny each and every allegation contained in paragraph "29" of the complaint.

30. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as the allegations contained in paragraph "30" of the complaint, as plaintiff's complaint does not appear to have Exhibit "A" attached to it.

31. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "31" of the complaint.

32. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "32" of the complaint.

33. Defendants admit the allegations contained in paragraph "33" of the complaint.

34. Defendants admit that the letter sent to the plaintiff was computer generated, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "34" of the complaint.

35. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegation contained in paragraph "35" of the complaint.

36. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "36" of the complaint.

37. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "37" of the complaint.

38. Defendants deny each and every allegation contained in paragraph "38" of the complaint.

39. Defendants deny each and every allegation contained in paragraph "39" of the complaint.

40. Defendants deny each and every allegation contained in paragraph "40" of the complaint.

41. Defendants deny each and every allegation contained in paragraph "41" of the complaint.

42. Defendants deny each and every allegation contained in paragraph "42" of the complaint.

43. Defendants deny each and every allegation contained in paragraph "43" of the complaint.

44. Defendants admit the allegations contained in paragraph "44" of the complaint.

45. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "45" of the complaint.

46. Defendants deny each and every allegation contained in paragraph "46" of the complaint.

47. Defendants deny each and every allegation contained in paragraph "47" of the complaint.

48. Defendants deny each and every allegation contained in paragraph "48" of the complaint.

49. Defendants deny each and every allegation contained in paragraph "49" of the complaint.

50. Defendants deny each and every allegation contained in paragraph "50" of the complaint.

51. Defendants admit the allegations contained in paragraph "51" of the complaint.

52. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

53. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

54. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

55. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

56. Defendants admit the allegations contained in paragraph "56" of the complaint.

57. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "57" of the complaint.

58. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "58" of the complaint.

59. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "59" of the complaint.

60. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "60" of the complaint.

61. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "61" of the complaint.

62. Defendants deny each and every allegation contained in paragraph "62" of the complaint.

63. Defendants deny each and every allegation contained in paragraph "63" of the complaint.

64. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "65" of the complaint.

65. Defendants repeat and reallege their previous admissions and denials contained in paragraphs "1" through "64" of the complaint.

66. Defendants deny each and every allegation contained in paragraph "66" of the complaint.

67. Defendants repeat and reallege their previous admissions and denials contained in paragraphs "1" through "66" of the complaint.

68. Defendants deny each and every allegation contained in paragraph "68" of the complaint.

69. Defendants deny each and every allegation contained in paragraph "69" of the complaint.

70. Defendants deny each and every allegation contained in paragraph "70" of the complaint.

71. Defendants deny each and every allegation contained in paragraph "71" of the complaint.

72. Defendants deny each and every allegation contained in paragraph "72" of the complaint.

73. Defendants deny each and every allegation contained in paragraph "73" of the complaint.

74. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "74" of the complaint.

75. Defendants deny each and every allegation contained in paragraph "75" of the complaint.

76. Defendants deny each and every allegation contained in paragraph "76" of the complaint.

77. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "77" of the complaint.

78. Defendants deny each and every allegation contained in paragraph "78" of the complaint.

79. Defendants deny each and every allegation contained in paragraph "79" of the complaint.

80. Defendants deny each and every allegation contained in paragraph "80" of the complaint.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY  
June 26, 2014

/S/ARTHUR SANDERS

ARTHUR SANDERS, ESQ.  
Attorney for defendant  
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TO:

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